

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

Defendant.

STIPULATION AND ~~[PROPOSED]~~ ORDER TO
MODIFY JAMES MORAN'S PRETRIAL
RELEASE CONDITIONS TO PERMIT TRAVEL

1. Mr. Moran is currently on pretrial release, post-conviction, subject to the condition that he may not travel outside the Northern District of California and the District of Nevada, where he currently resides. Mr. Moran, as of August 30, 2023, will also be subject to location monitoring, which would remain connected during the period of his proposed travel.
2. The parties agree that Mr. Moran's release conditions should be temporarily modified to permit Mr. Moran to travel with his father to St. Louis, Missouri and Milwaukee, Wisconsin, to visit two of his aunts. He and his father would depart Reno by car on September 12, 2023, and arrive in Missouri on September 15, 2023. They would then travel to Milwaukee on September 26, 2023 and stay with another aunt until October 7, 2023. They intend to return to Reno, Nevada on October 10, 2023.

3. Pretrial Services Officer Pepper Friesen has no objection to the request.
4. AUSA Kaitlin Paulson has no objection to the request.
5. Mr. Moran shall provide his pretrial officer with a detailed travel itinerary.

IT IS SO STIPULATED.

DATED: August 30, 2023 /s/
KAITLIN RACKERBY PAULSON
Assistant United States Attorney

DATED: August 30, 2023 /s/
JULIA M. JAYNE
Counsel for Defendant JAMES MORAN

~~[PROPOSED]~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED. Mr. Moran is permitted to travel to outside the Northern District of California and the District of Nevada to St. Louis, Missouri and Milwaukee, Wisconsin, by car, from September 12 – October 10, 2023. Mr. Moran shall provide his pretrial officer with a detailed itinerary. All other pretrial release conditions remain the same.

IT IS SO ORDERED.

DATED: August 31, 2023



HON. JOSEPH S. SPERO
United States Magistrate Judge